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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In Re

MARINE ENVIRONMENTAL
REMEDIATION GROUP, LLC, and MER
GROUP PUERTO RICO LLC,

Debtors,

MARINE ENVIRONMENTAL
REMEDIATION GROUP, LLC, and MER
GROUP PUERTO RICO LLC,

Plaintiffs,

v.

STARR INDEMNITY & LIABILITY
COMPANY,

Defendant

Chapter 11

Case No. 19-18994 (VFP)

Jointly Administered

Adv. Pro. No. 20-01141 (VFP)

**NOTICE OF CROSS-MOTION FOR
RELIEF FROM THE AUTOMATIC
STAY TO ALLOW PARTIES TO
CONTINUE INSURANCE
COVERAGE LITIGATION PENDING
IN THE SOUTHERN DISTRICT OF
NEW YORK**

**VIA ELECTRONIC CASE FILING, AND
VIA EMAIL TO ALL PARTIES ON THE ATTACHED SERVICE LIST**

PLEASE TAKE NOTICE that on Wednesday, June 10, 2020, at 10:00 a.m. or as soon thereafter as counsel may be heard, the undersigned attorneys for Starr Indemnity & Liability

Company (“Starr”), shall move before the Honorable Vincent F. Papalia, United States Bankruptcy Judge for an Order Granting Relief From the Automatic Stay in Order for the Parties to Continue Insurance Coverage Litigation Pending in the Southern District of New York.

PLEASE TAKE FURTHER NOTICE that in support of said Motion, Starr will rely upon the accompanying Memorandum of Law and Declaration of Guerric Russell filed herewith and such oral argument as the Court may entertain on the return date of this Motion.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order Granting Relief From Stay is submitted herewith.

Oral argument is requested if this Motion is opposed.

Respectfully submitted,

CONNELL FOLEY LLP
Attorneys for Starr Indemnity & Liability

By: /s/ Robert Scheinbaum
Philip W. Allogramento III
Robert K. Scheinbaum

Dated: May 21, 2020

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